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June 27, 2016

**Via Electronic Comment Filing System**

Ms. Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

Re: In the matter of Request for Review by The Renaissance Charter High School for Innovation of Decision of Universal Service Administrator, dated April 29, 2016 denying Applicant's Appeal of Invoice Deadline Extension Request in order to file a Form 472 (BEAR) for internet service  
CC Docket No. 02-6  
Billed Entity Number 16056470  
Form 471 Application: 989753  
Funding Request Number: 2701537

Dear Secretary Dortch:

Pursuant to 7 C.F.R. §54.719(A-B) (2015), The Renaissance Charter High School for Innovation ("Innovation") submits this appeal of the Decision of the Universal Service Administrator denying the school's appeal of its invoice deadline extension request, which was the recommendation of its staff member in order to secure completion of a BEAR form.

We respectfully request that the FCC overturn USAC's decision on appeal, and in turn either grant an invoice deadline extension of the above-referenced funding request number in order to correct a timely submitted BEAR Form or simply allow us to file a completed BEAR Form.

**Overview and Background:**

The following points summarize the history of our process with USAC related to this Funding Request:

- On October 23, 2015, we submitted a timely, certified BEAR Form for the internet service, relying on an customer billed date located on the initial invoice. (Exhibits A and B).
- On November 6, 2015, we received a BEAR Notification letter, *after the invoicing deadline*, approving \$0.00 for payment. (Exhibit C).
- On November 23, 2015, we spoke with the NYS E-rate Coordinator in person, who recommended calling USAC to request an appeal to fix the BEAR form
- On December 16, 2015, we called USAC requesting next steps, where they advised submitting an invoice deadline extension request (Exhibit D).



- On December 17, 2015, we filed that first invoice deadline extension request to USAC/ (Exhibit E).
- On January 18, 2016, we received a rejection notice of that invoice deadline extension request. (Exhibit F).
- On March 17, 2016, we submitted an appeal directly to USAC for an invoice deadline extension request. (Exhibit G).
- On April 29, 2016, we received a USAC Administrator's denial of our appeal. (Exhibit H).

All of the narrative surrounding our requests can be found in that last appeal, attached here at Exhibit G. However, we summarize our main points below.

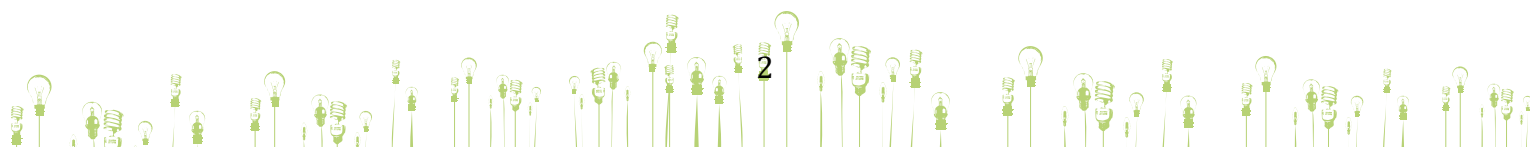
The school's consultant filed the BEAR form exactly as required, but inputting the true invoice date of June 30, 2014, which was the date of the first billed invoice. (See Exhibit B). Many internet services, like the one at issue, pre-bills their service, i.e., sends an invoice in advance for the upcoming month. In this case, Sprint's (d/b/a Clear) initial invoice for service for the first month FY2015 was June 30, 2014, one day before the start of the fiscal year. However, because of the design defaults in the USAC system for entering, submitting and reviewing BEAR Forms, USAC does not accept BEAR Forms with customer billed dates before the start of the fiscal year in this case, July 1, 2014) but it does not inform the Billed Entity until after a Billed Entity has submitted and has certified a BEAR form and only by mail several days after submission.

At no time before submitting a BEAR form on the USAC electronic filing portal does it prompt the user that a submission like this would be rejected weeks after the fact. There is no error message pop-up; no warning is provided that the customer billed date is before the allowable period (even if the dates of service are during the fiscal year), even though there are warnings if a user inputs the wrong FRN or even neglects to input a fax number.

Because of this, the school did not learn until well after the October deadline, and honestly, with little explanation in the BEAR Notification letter that a reimbursement request was denied. The letter itself only states "Billed Date Before 486 Service-State Date." (Exhibit C). That language does not state what "Billed Date" means and is in effect, if interpreted one way, is asking the Billed Entity to submit a factually wrong "Billed Date," even if it, as in this case, is legitimately invoiced for services beginning on the first allowable Form 486 Start Date.

Since that notification, the school took *at least* four different steps to address the matter.

1. We spoke directly in person with Wim Himsworth, New York State's E-rate Coordinator on November 23, 2015, about our very issue. He stated that neither letter nor appeal was necessary for a "zero funding BEAR notification." Rather, all we needed to do was call USAC, who will allow us to resubmit the BEAR form without prejudice. This conversation occurred *after* the deadline passed for BEAR invoicing.



2. We then called USAC's Customer Service Line on December 16<sup>th</sup>, 2015 and spoke with Michael Leonard, requesting such an opportunity. In that call, with case number 35199, Mr. Leonard advised us to instead file an invoice deadline extension request, even though the opportunity for that had passed. He expressed confidence that there would be no issues.
3. We filed an invoice deadline extension request the next day. We received a rejection a month later.
4. We then filed an appeal of a denial of that invoice deadline extension directly to USAC on March 17, 2016, highlighting the fact that we followed USAC's guidance on the matter.

We now take this fifth action, by appealing to the FCC directly.

### **Summary of Our Position:**

Our basis for appeal stem from three main premises. First, our original submission for BEAR reimbursement met all of the technical and submission requirements to be reimbursed. Second, our reliance on USAC's recommendations to redress the issue apparently pinned our requests to an invoice deadline extension process, which was destined to fail at the outset since we did not receive a notice denying our reimbursement until after that invoice deadline had passed. Third, this elongated process and timeline for requesting a simple typographical correction has created an undue burden on the school to secure the reimbursement, only to accommodate the quirks in USAC's own system for submitting reimbursements.

As such, our appeal fits within the FCC's well-regarded history of considering the public interest, especially when an applicant meets established criteria for a timely, certified BEAR Form reimbursement.

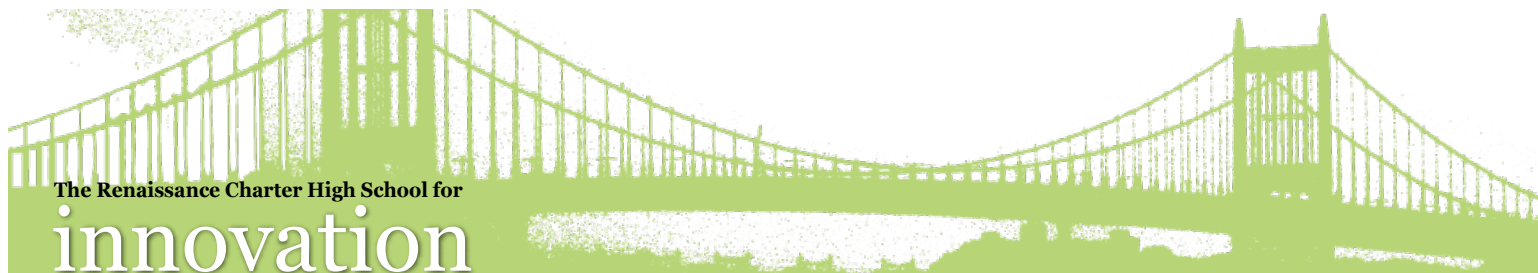
### *Timely Submission:*

- We met all of the requirements for a filed Form 472 BEAR Form, all submitted by October 28, 2015, by securing certification before that deadline for invoiced internet service between July 1, 2014 and June 30, 2015. That the invoice itself was issued one day in advance on June 30, 2014, should not preclude the entire BEAR Form 472.

### *Reliance on USAC Recommended Courses of Action and Stringent Appeal Guidelines for Invoice Deadline Extension Requests:*

- As a school, we relied directly on not one, but two different representatives of the E-rate Program. The NYS E-rate Coordinator stated to us personally that a call to USAC will allow us to correct the BEAR Form invoice date. However, the USAC Customer Service Representative did not accommodate that request, but stated that we should pursue an invoice deadline extension request, even though the deadline for such a request had passed. In our request and subsequent appeal, we beseeched USAC to provide us with





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the time to correct the one typographical issue to confirm with their BEAR Form submission portal. However, the denial in both instances was based on strict liability grounds for being untimely without considering clear mitigating factors. First, the whole reason for the post-deadline extension request was that our BEAR notification letter was received post-deadline and USAC themselves advised us on this process. Second, the FCC's consideration of the public interest would presumably grant at least the ability to resubmit the acceptable (yet incorrect) customer billed date so that it cooperates with USAC's system, a system that did not warn us at submission that the form might be zero-funded in the first place.

- No process exists and may not exist in the current system to address simple clerical errors. The current system, found at <https://www2.sl.universalservice.org/bear/login.aspx>, does not provide any warnings at the time of submission to this issue.

#### *Undue Burden and Consideration of the Public Interest:*

- Our submission of the BEAR Form was only a clerical issue because the invoicing portal made it so. The multiple attempts to efficiently resolve the situation, including two personal attempts at outreach, an extension request and then followed by two lengthy appeals constitute an undue burden and against the public interest if our request required that many hours to move the date from the correct June 30, 2014 to the incorrect, but acceptable date of July 1, 2014 in the USAC portal. The invoice date of June 30, 2014 was accurate *and* also legitimate for services occurring within the funding year beginning July 1, 2014.
- The reason for the denial is based on strict liability, where in this case, we believe that some deference to our situation is warranted. One can argue that all invoice deadline requests should be denied simply because it was past the deadline to do so. However, we received no notice and would have had zero inkling that our BEAR form submission would be denied (or "zeroed") for submitting an actual invoice date for a pre-billed internet service. It would have been more appropriate and less an undue burden if the portal simply provided a warning dialog box, as it does for other issues including a missing fax number, notifying users that an invoice date would not be accepted.

Instead, in our case, we received a BEAR Notification form received after the invoice deadline had passed, and were then directed by USAC to file a futile invoice deadline extension request leading to this appeal to the FCC eight months later.

#### **Conclusion:**

The key issues for review in this appeal are:

- Whether a Billed Entity should be granted an opportunity to correct a timely Form 472 BEAR Form that contained a "customer billed date" that was accurate yet did not trigger a warning at the time of submission, but did trigger the issuance of a zero reimbursement BEAR Notification letter after the invoicing deadline of 120 days after the last day of





service.

- Whether a Billed Entity should be granted an opportunity to correct a timely Form 472 BEAR Form after relying on a process to correct the error directly provided by USAC, but that which resulted in a more time-consuming denial and series of appeals.

We believe, as illustrated above, that the public interest and circumstances weigh in favor of Renaissance Charter High School for Innovation. USAC's systems should have provided a warning at the time of submission if an accurately submitted "customer billed date" would prompt immediate rejection of a BEAR Form claim, especially one that would be received after the invoicing window. Furthermore, the process to shift this billed date one day later should have been consistently applied, since the New York State E-rate Coordinator could not have possibly fabricated the resolution process for a zero reimbursement BEAR Form, and not led us to a lengthy invoice deadline extension request process and appeal that are automatically rejected on face.

We understand the purpose of the program deadlines and requirements so that USAC can expedite resources to high-needs schools as our own. We have always fully intended to adhere to them and have not broken any Commission rule. We respectfully request an opportunity to file a Form 472 BEAR Form that contains an initial date satisfactory to the USAC portal.

We appreciate your consideration of this appeal. If you have any additional questions or require more documentation concerning our appeal, please do not hesitate to contact me at [erate@innovationhighschool.org](mailto:erate@innovationhighschool.org). Paul Le assisted us with our applications and appeals, and can also provide additional answers via [erate@charterschoolincubator.org](mailto:erate@charterschoolincubator.org) and 347.772.8553 as needed.

Sincerely,



Stephen Falla Riff  
Executive Director

## Table of Exhibits

| # | Date              | Exhibit   |
|---|-------------------|---|
| A | October 23, 2015  | Original Form 472                                     |
| B | June 30, 2014     | Invoice showing customer billed date of June 30, 2014 |
| C | November 6, 2015  | BEAR Notification Letter                              |
| D | December 16, 2015 | Record of call made to USAC                           |
| E | December 17, 2015 | Invoice Deadline Extension Request                    |
| F | January 18, 2016  | Rejection of invoice deadline Extension Request       |
| G | March, 17, 2016   | Appeal to USAC Administrator                          |
| H | April 29, 2016    | Denial of Appeal by USAC Administrator                |

# Exhibit A

## Universal Service for Schools and Libraries

Please read instructions before  
completing.

(To be completed by schools, libraries, or  
consortia.)

### BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Only one Service Provider Identification Number (SPIN) per form.

Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

#### FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

|  |  |
|--|--|
| Applicant Form Identifier (Create an identifier for your own reference)<br><b>2014-15-TRCHSI-Clear</b> | FCC Form 472 Invoice #<br>(To be inserted by administrator) <b>2272990</b> |
|--|--|

#### BLOCK 1: HEADER INFORMATION

|   |  |
|---|--|
| 1. Billed Entity Name   | <b>THE RENAISSANCE CHARTER SCHOOL FOR INNOVATION</b> |
| 2. Billed Entity Number                                       | <b>16056470</b>                                      |
| 3. Service Provider Identification Number (SPIN)              | <b>143006742</b>                                     |
| 4. Contact Name   | <b>Paul Le</b>                                       |
| 5. Contact Telephone Number                                   | <b>347- 7728553 ext</b>                              |
| 6. Total Reimbursement Amount (total from Block 2, Column 14) | <b>\$15,694.72</b>                                   |



## Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name \_ THE RENAISSANCE CHARTER SCHOOL FOR INNOVATION Billed Entity Number \_ 16056470  
 Contact Name \_ Paul Le Contact Telephone Number \_ 347-7728553  
 Applicant Form Identifier \_ 2014-15-TRCHSI-Clear

### BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

|   | (7)  | (8)   | (9)                                | (10)   | (11)  | (12)   | (13)             | (14)  |
|---|--|---|------------------------------------|--|---|--|------------------|---|
|   | FCC Form 471<br>Application<br>Number<br>(from Funding<br>Commitment<br>Decision Letter) | Funding<br>Request<br>Number (FRN)<br>(from Funding<br>Commitment<br>Decision Letter) | Bill Frequency                     | Customer<br>Billed Date<br>(mm/yyyy)   | Shipping Date<br>to Customer<br>or Last Day of<br>Work<br>Performed<br>(mm/dd/yyyy) | Total<br>(Undiscounted)<br>Amount for<br>Service | Discount<br>Rate | Amount Billed to<br>USAC<br>(Column 12<br>multiplied by<br>Column 13) |
|   |  |   | DO NOT<br>WRITE IN THIS<br>COLUMN. | For each FRN, complete either<br>Column (10) or Column (11), but<br>not both Columns |   |  |                  |   |
| 1   | 989753   | 2701537   |                                    | 6/30/2014  |   | \$17,438.58                                      | 90.00            | \$15,694.72   |
| 2   |  |   |                                    |  |   |  |                  |   |
| 3   |  |   |                                    |  |   |  |                  |   |
| 4   |  |   |                                    |  |   |  |                  |   |
| 5   |  |   |                                    |  |   |  |                  |   |
| 6   |  |   |                                    |  |   |  |                  |   |
| 7   |  |   |                                    |  |   |  |                  |   |
| 8   |  |   |                                    |  |   |  |                  |   |
| 9   |  |   |                                    |  |   |  |                  |   |
| 10  |  |   |                                    |  |   |  |                  |   |
| 11  |  |   |                                    |  |   |  |                  |   |
| 12  |  |   |                                    |  |   |  |                  |   |
| 13  |  |   |                                    |  |   |  |                  |   |
| 14  |  |   |                                    |  |   |  |                  |   |
| <b>TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)</b> |  |   |                                    |  |   |  |                  | <b>\$15,694.72</b>  |

# BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name THE RENAISSANCE CHARTER SCHOOL FOR INNOVATION

Billed Entity Number 16056470

Contact Name Paul Le

Applicant Form Identifier 2014-15-TRCHSI-Clear

## Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated Form 486.
- B. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Form 471 Funding Commitment Decision Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for five years any and all records that I rely upon to fill in this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person Signed electronically by PAUL LE

16. Date 10/23/2015

17. Printed name of authorized person PAUL LE

18. Title or position of authorized person CONSULTANT

19. Telephone number of authorized person 347- 7728553

20. Address of authorized person 342 E. 119TH ST., SUITE 3A, NEW YORK NY 10035

# BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name THE RENAISSANCE CHARTER SCHOOL FOR INNOVATION

Billed Entity Number 16056470

Contact Name Paul Le

Applicant Form Identifier 2014-15-TRCHSI-Clear

## Block 4: Service Provider Acknowledgment

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:

- A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 20 business days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B. below.
- B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discounts for the Billed Entity Applicant Reimbursement Form.
- C. I certify that, in addition to the foregoing, this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

21. Signature of authorized person (fax, copy or original signature) **Signed electronically by Christina Halley**

22. Date **10/23/2015**

23. Printed name of authorized person **Christina Halley**

24. Title or position of authorized person **Manager**

25. Telephone number of authorized person - **ext**

26. Address of authorized person **12524 Sunrise Valley Dr, Reston VA 20196**

## 27. Applicant Remittance Information

Name **Debbie Degiau**

Title **Director of Finance**

Street Address

**The Renaissance Charter High School for Innovation**

**410 East 100th Street, 2nd Floor**

**New York, NY 10029**

A paper copy of this Form (pages 1-4) should be mailed to:

SLD BEAR FCC Form 472  
P.O. Box 7026  
Lawrence, KS 66044-7026

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form (pages 1-4) should be mailed to:

SLD Forms  
ATTN: SLD BEAR FCC Form 472  
3833 Greenway Drive  
Lawrence, KS 66046  
Phone: 1-888-203-8100



# Exhibit B



How to reach us...  
Online Live Chat 24x7  
Or call

www.clear.com  
888.888.3113

## Your Billing Summary

|                  |   |
|------------------|---|
| Billing Date     | 06/30/14  |
| Invoice Number   | 4-140630-38371                                    |
| Payment Due Date | Due Upon Receipt                                  |
| Customer Name    | RENAISSANCE CHARTER HIGH SCHOOL<br>FOR INNOVATION |
| Customer Number  | 4025010   |
| Billing Address  | 410 E 100TH ST<br>NEW YORK NY 10029-6604          |

You will find everything you need to manage your account, 24/7, online at [www.clear.com/MyAccount](http://www.clear.com/MyAccount). In **My Account**, you can access your email, update your account, view your billing information, and more. Go to [www.clear.com](http://www.clear.com) and click on My Account.

## Account Summary

|                         |                   |
|-------------------------|-------------------|
| Previous Balance        | \$4,436.13        |
| Payments                | \$1,478.71CR      |
| Past Due Balance        | \$2,957.42        |
| Current Charges         | \$1,478.71        |
| <b>TOTAL AMOUNT DUE</b> | <b>\$4,436.13</b> |

## Summary of Current Charges

|  |                   |
|--|-------------------|
| Total Monthly Charges                      | \$1,478.71        |
| Digital Voice                              | \$0.00            |
| Features                                   | \$0.00            |
| One-Time Charges                           | \$0.00            |
| Promotions/Discounts/Adjustments           | \$0.00            |
| Other Fees & Non-Gov't-Mandated Surcharges | \$0.00            |
| Taxes & Gov't-Mandated Surcharges          | \$0.00            |
| <b>TOTAL CHARGES</b>                       | <b>\$1,478.71</b> |



1475 120TH AVE NE  
Kirkland WA 98005-2127

|                 |                          |
|-----------------|--------------------------|
| Billing Date    | 06/30/14                 |
| Invoice Number  | 4-140630-38371           |
| Customer Name   | RENAISSANCE CHARTER HIGH |
| Customer Number | 4025010                  |

|                   |                   |
|-------------------|-------------------|
| <b>Amount Due</b> | <b>\$4,436.13</b> |
|-------------------|-------------------|

Amount Enclosed:

\$

7531 0100 MULTI D0 01 07012014 NNNNNNN 0000654 Non-Q 1 oz.

RENAISSANCE CHARTER HIGH SCHOOL FOR INNO  
MATTHEW BOYLE  
410 E 100TH ST  
NEW YORK NY 10029-6604



PAYMENT OF \$4436.13 WILL BE  
CHARGED TO THE RECURRING  
PAYMENT METHOD ON FILE ON  
07/01/2014



Billing Date  
Invoice Number  
Payment Due Date  
Customer Number

Page 2 of 7  
06/30/14  
4-140630-38371  
Due Upon Receipt  
4025010

## Payments on Account

| Description                | Date     | Amount              |
|----------------------------|----------|---------------------|
| Payment: Credit/Debit Card | 06/09/14 | \$1,478.71CR        |
| <b>TOTAL PAYMENTS</b>      |          | <b>\$1,478.71CR</b> |

## Service Account Summary

| Service Name         | Service Account ID | Total Monthly Charges | Digital Voice | Features      | One-Time Charges | Promos/ Discs/ Adjs | Othr Chrgs Non-Gov't Mandated & Surcharges * | Taxes & Gov't-Mandated Surcharges** | Total Charges     |
|----------------------|--------------------|-----------------------|---------------|---------------|------------------|---------------------|--|-------------------------------------|-------------------|
| RCHSFI01             | 5321803            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI02             | 5321839            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI03             | 5321840            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI04             | 5321841            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI05             | 5321863            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI06             | 5321864            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI07             | 5321865            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI08             | 5322034            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI09             | 5322035            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI10             | 5322076            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI11             | 5322077            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI12             | 5322226            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI13             | 5322227            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI14             | 5322229            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI15             | 5322230            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI16             | 5322263            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI17             | 5322264            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI18             | 5322265            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI19             | 5322266            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI20             | 5322287            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI21             | 5322288            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI22             | 5322289            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI23             | 5322290            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI24             | 5322342            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI25             | 5322343            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI26             | 5322344            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI27             | 5322345            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI28             | 5322389            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| RCHSFI29             | 5322390            | 50.99                 | 0.00          | 0.00          | 0.00             | 0.00                | 0.00   | 0.00                                | 50.99             |
| <b>TOTAL CHARGES</b> |                    | <b>\$1,478.71</b>     | <b>\$0.00</b> | <b>\$0.00</b> | <b>\$0.00</b>    | <b>\$0.00</b>       | <b>\$0.00</b>                                | <b>\$0.00</b>                       | <b>\$1,478.71</b> |



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## Service Account Details

### RCHSFI01 - 5321803

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI01 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI01 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI02 - 5321839

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI02 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI02 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI03 - 5321840

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI03 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI03 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI04 - 5321841

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI04 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI04 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI05 - 5321863

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI05 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI05 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI06 - 5321864

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI06 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI06 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI07 - 5321865

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI07 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI07 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |





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### RCHSFI08 - 5322034

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI08 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI08 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI09 - 5322035

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI09 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI09 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI10 - 5322076

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI10 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI10 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI11 - 5322077

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI11 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI11 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI12 - 5322226

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI12 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI12 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI13 - 5322227

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI13 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI13 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RCHSFI14 - 5322229

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RCHSFI14 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RCHSFI14 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |



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### RGHSFI15 - 5322230

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI15 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI15 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI16 - 5322263

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI16 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI16 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI17 - 5322264

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI17 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI17 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI18 - 5322265

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI18 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI18 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI19 - 5322266

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI19 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI19 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI20 - 5322287

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI20 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI20 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI21 - 5322288

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI21 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI21 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |



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### RGHSFI22 - 5322289

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI22 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI22 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI23 - 5322290

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI23 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI23 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI24 - 5322342

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI24 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI24 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI25 - 5322343

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI25 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI25 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI26 - 5322344

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI26 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI26 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI27 - 5322345

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI27 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI27 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |

### RGHSFI28 - 5322389

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total   |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|---------|
|   |                   |                |                 |            | Quantity           | Units | Rate |         |
| CURRENT SERVICES                              |                   |                |                 |            |                    |       |      |         |
| RGHSFI28 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99   |
| TOTAL CURRENT SERVICES                        |                   |                |                 |            |                    |       |      | \$50.99 |
| TOTAL RGHSFI28 SERVICE ACCOUNT CHARGES        |                   |                |                 |            |                    |       |      | \$50.99 |



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RCHSFI29 - 5322390

|   | Period            | Monthly Charge | Usage Allowance | Usage Used | Additional Charges |       |      | Total          |
|---|-------------------|----------------|-----------------|------------|--------------------|-------|------|----------------|
|   |                   |                |                 |            | Quantity           | Units | Rate |                |
| <b>CURRENT SERVICES</b>                       |                   |                |                 |            |                    |       |      |                |
| RCHSFI29 4G Office Pro Plan (Legacy) 2 Servic | 06/30/14-07/30/14 | 50.99          | --              | --         | --                 | --    | --   | 50.99          |
| <b>TOTAL CURRENT SERVICES</b>                 |                   |                |                 |            |                    |       |      | <b>\$50.99</b> |
| <b>TOTAL RCHSFI29 SERVICE ACCOUNT CHARGES</b> |                   |                |                 |            |                    |       |      | <b>\$50.99</b> |

### \*CLEAR Surcharges

Your invoice additionally may include certain CLEAR surcharges, which assist us in defraying and recovering costs that we incur in contributing to and participating in various mandatory programs that are operated by different governmental entities and that generally are designed to help promote nationwide telecommunications service. These charges are not taxes and are subject to change, with or without notice, from time to time.

### \*\*Taxes and Governmental Surcharges/Fees

Your invoice will include various taxes, governmental surcharges, and governmental fees that the law requires us to pass along to and collect from our customers. Each of these charges is subject to change, without notice, from time to time.



# Exhibit C



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

November 6, 2015

Christina Halley  
Sprint Spectrum, L.P.  
12524 Sunrise Valley Drive  
2nd Floor, VARESF0205-2A2063  
Reston, VA 20196

Re: Invoice Number - as assigned by USAC: 2272990  
Service Provider Identification Number: 143006742  
Reimbursement Form Number: 2014-15-TRCHSI-Clear  
Billed Entity Number: 16056470

Paul Le  
THE RENAISSANCE CHARTER HIGH SCHOOL FOR INNOVATION  
342 East 119th St, Suite 3A  
New York, NY 10035

Preferred Mode of Contact: E-mail at [erate@charterschoolincubator.org](mailto:erate@charterschoolincubator.org)  
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR to request reimbursement for any unpaid lines.

We recommend using the BEAR Online tool from the Apply Online area or Required Forms section of our website for additional submissions. If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

Pursuant to the Federal Communication Commission's (FCC) Second Report and Order and Further Notice of Proposed Rulemaking (FCC 03-101, released April 29, 2003), you must remit the amount shown as "Total Amount of Reimbursement Approved for Payment" above to your customer no later than 20 days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to your customer (See BEAR Form, Block 4, Service Provider Acknowledgment).

The USAC check should be mailed to the service provider named above within 20 days of the date of this letter.

Schools and Libraries Division - Correspondence Unit  
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685  
Visit us online at: [www.usac.org/sl](http://www.usac.org/sl)



for  
s established

r time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division  
Universal Service Administrative Company

CC: THE RENAISSANCE CHARTER HIGH SCHOOL FOR INNOVATION

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 989753  
Funding Request Number: 2701537  
Funding Year 2014: 07/01/2014 - 06/30/2015  
Contract Number: MTM  
Funding Commitment Decision: \$14404.07  
Reimbursement Amount for this FRN: \$0.00  
Reimbursement Request Decision Explanation:  
Billed Date Before 486 Service-Start Date;

---

# Exhibit D

**From:** EPC Application Administrator EPC.Application.Administrator@usac.org  
**Subject:** USAC Notification: New Customer Service Case Created  
**Date:** December 16, 2015 at 6:03 PM  
**To:** erate@charterschoolincubator.org

---

EA



Hello,

The USAC Client Service Bureau has created the following case:

Description: Consultant wanting information on a BEAR  
Priority: Medium  
Created By: Michael Leonard  
Received: 12/16/2015 6:02 PM EST  
Case Number: 35199

If the details of the case are not correct, you may view/modify the case record [here](#) or contact us by phone at (888) 203-8100.

Thank you.

Universal Service Administration Company

NOTE: Please do not reply to this email.

This message has been sent by EPC

# Exhibit E





# CHARTER SCHOOL INCUBATOR

December 17, 2015

**Via Email**

Invoice Deadline Extension Request  
Schools and Libraries - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

**Re: Invoice Deadline Extension Request**

Dear Sir or Madam:

I write to request the allowable one-time 120 day extension of the invoice delivery deadline for the below referenced FRN:

| Billed Entity   | Form 471 # | Funding Request # | Service Provider Name | SPIN      |
|---|------------|-------------------|-----------------------|-----------|
| The Renaissance Charter High School for Innovation (16056470) | 989753     | 2701537           | Sprint Spectrum, L.P. | 143006742 |

The BEAR Form (Invoice Number 2272990) was filed and certified in a timely manner, as seen in the attachment. However, we received the November 6, 2015 BEAR Notification letter approving \$0.00 for payment. The service is a pre-paid internet service with a billed date of 6/30/2014, which was rejected because it was one day before the start of the fiscal year. We'd appreciate an opportunity to quickly refile and secure certification of a new BEAR Form.

The contact information is as follows:

| Contact Information               |  |
|-----------------------------------|--|
| Contact Person Name               | Paul Le  |
| Contact Mailing Address           | 342 East 119 <sup>th</sup> St., Suite 3A<br>New York, NY 10035                         |
| Contact Phone Number              | 347.772.8553   |
| Contact Email Address (preferred) | <a href="mailto:erate@charterschoolincubator.org">erate@charterschoolincubator.org</a> |

Please do not hesitate to contact me with any questions.

Sincerely,



Paul Le  
Consultant

[Need Help?](#)[BEAR Home](#)[New BEAR Form](#)[Track Form](#)[Bulk Download](#)[Terms and Conditions](#)[Logout](#)

## View BEAR Invoice

[PRINTABLE PAGE](#)**Invoice ID: 2272990****Created on 10/23/2015 5:21 AM****Last updated on 11/3/2015 5:02 AM****Applicant Form Identifier** 2014-15-TRCHSI-Clear**Block 1: Header Information**[Need Help?](#)**1. Billed Entity Name**THE RENAISSANCE  
CHARTER SCHOOL FOR  
INNOVATION**2. Billed Entity Number**

16056470

**3. Service Provider**Identification Number (SPIN)  
143006742**4. Contact Name**

Paul Le

**5. Contact Telephone Phone**

( 347 ) 772-8553

**Contact Fax**

( 347 ) 620-7291

**Contact Email**

erate@charterschoolincubator.org

**6. Total Reimbursement Amount**

(total from Block 2, Column 14)

\$ 15694.72

**Block 2: Line Item Information Per Funding Request Number**[Need Help?](#)

| 7. FCC Form 471<br>Application<br>Number        | 8. Funding<br>Request<br>Number (FRN)              | 10. Customer<br>Billed Date | 11. Shipping<br>date to<br>Customer or<br>Last Day of<br>Work<br>Performed<br>(mm/dd/yyyy) | 12. Total<br>(Undiscounted)<br>Amount for Service | 13.<br>Discount<br>Rate | 14. Discount<br>Amount Billed to<br>USAC<br>(Column 12<br>multiplied by<br>Column 13) | Approval<br>Status |
|---|--|-----------------------------|--|---|-------------------------|---|--------------------|
| (from Funding<br>Commitment<br>Decision Letter) | (from Funding<br>Commitment<br>Decision<br>Letter) |                             |  |   |                         |   |                    |
| 1) 989753                                       | 2701537  | 6/30/2014                   |  | \$ 17438.58                                       | 90                      | \$ 15694.72   | COMPLETED          |

**Block 3: Billed Entity Certification**[Need Help?](#)**Contact Information for Billed Entity Authorized Person:**

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

**Submission Date** 10/23/2015

17. Name PAUL LE  
18. Title/Position CONSULTANT  
20. Address 1 342 E. 119TH ST., SUITE 3A  
Address 2  
City NEW YORK  
State NY  
Zip Code 10035 -

19. Phone Number ( 347 ) 772-8553  
19a. Fax Number ( 347 ) 620-7291  
19b. Email ERATE.APPS@GMAIL.COM  
19c. Name of Authorized  
Person's Employer

**Block 4: Service Provider Acknowledgment**[Need Help?](#)**Contact Information for Service Provider Authorized Person:**

Submission Date 10/23/2015

23. Name Christina Halley  
24. Title/Position Manager  
26. Address 1 12524 Sunrise Valley Dr  
Address 2  
City Reston  
State VA  
Zip Code 20196 -

25. Phone Number ( 703 ) 592-4774  
25a. Fax Number ( 866 ) 497-8675  
25b. Email christina.halley@mail.sprint.com  
25c. Name of Authorized  
Person's Employer Sprint

**27. Applicant Remittance Information**

Name Debbie Degiau  
Title/Position Director of Finance  
Phone Number ( 212 ) 722-5871  
Address 1 The Renaissance  
Charter High School for  
Innovation  
Address 2 410 East 100th Street,  
2nd Floor  
City New York  
State NY  
Zip Code 10029

**Additional Comments:**

# Exhibit F

**From:** deadline@sl.universalservice.org  
**Subject:** Administrator's Decision on Invoice Deadline Extension Request  
**Date:** January 18, 2016 at 1:22 PM  
**To:** erate@charterschoolincubator.org

D

This serves as acknowledgement and dismissal of your request for a deadline extension for the following FRNs:

2701537

Current deadline extension rules and procedures do not allow approval for the reason submitted.

**TO APPEAL THIS DECISION:**

If you wish to appeal the decision indicated in this letter, your appeal must be POSTMARKED within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

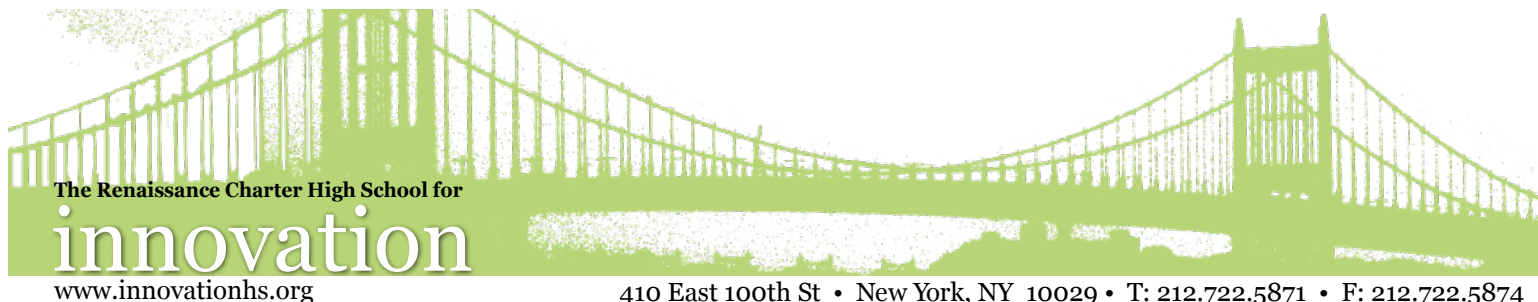
1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Administrative Decision you are appealing. Indicate the relevant funding year and the date of this letter. Your letter of appeal must also include the Billed Entity Name, the Form 471 Application Number, and the SLD Invoice Number from the top of your letter.
3. When explaining your appeal, copy the language or text from this letter that is at the heart of your appeal to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, 30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

Schools and Libraries Division  
Universal Service Administrative Company

This e-mail has been generated programmatically. Please do not respond to this e-mail.

# Exhibit G



March 17, 2015

**Via Email**

Letter of Appeal  
Schools and Libraries Division – Correspondence Unit  
30 Lanidex Plaza West  
P.O. Box 685  
Parsippany, NJ 07054-0685  
appeals@sl.universalservice.org

Re: Appeal of Administrator's Decision on Invoice Deadline Extension Request dated January 18, 2016 for FRN 2701537, SLD Invoice Number 2272990

Dear Sir or Madam:

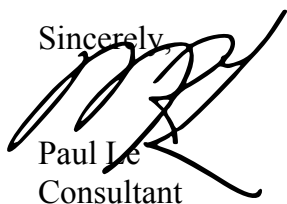
The Renaissance Charter High School for Innovation, with Billed Entity Number 16056470, submits this appeal of the administrator's decision denying an invoice deadline extension request, which was filed at the suggestion of USAC's Call Center when a call was made on December 16, 2015.

We respectfully request that USAC allow the funds to be properly reimbursed for a total of \$15,694.72 for internet service, based on either approving for reimbursement that amounts previously submitted by the school and certified by the vendor, or by extending the invoice deadline to allow the school to resubmit its BEAR invoice and for the vendor to certify it.

While the summary tables and exhibits below provide more detailed information for this appeal, the reason for the appeal stems from an issue with the BEAR Form itself. The form requires the BEN to list the invoice date, but USAC rejects the BEAR Form with a \$0.00 payment if the first invoice for service within the funding year is dated before the funding year begins. This is often the case for internet service from cable internet and other providers, where the first invoice is dated in June but the billed service begins on July 1.

If you have any additional questions or require more documentation, please feel free to contact me at the email or phone number below.

Sincerely,

  
Paul Le  
Consultant

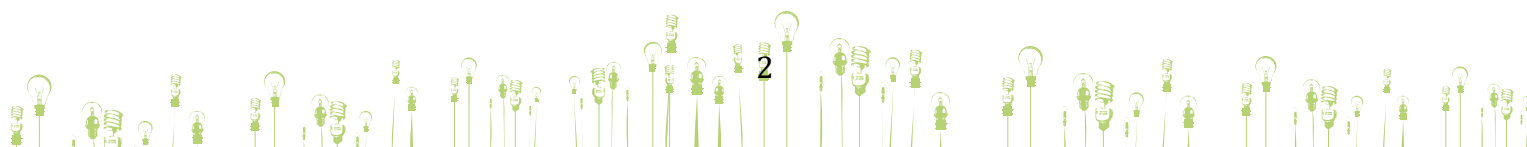


Attachments: Contact Information  
Appeal Information and Explanation

### Required Elements for Appeal

| <b>Contact Information</b>           |  |
|--------------------------------------|--|
| Appellant/Organization Name          | The Renaissance Charter High School for Innovation                                     |
| Billed Entity Number                 | 16056470   |
| Contact Person Name                  | Paul Le  |
| Contact Mailing Address              | 342 East 119 <sup>th</sup> St., Suite 3A<br>New York, NY 10035                         |
| Contact Phone Number                 | 347.772.8553   |
| Contact Email Address<br>(preferred) | <a href="mailto:erate@charterschoolincubator.org">erate@charterschoolincubator.org</a> |

| <b>Appeal Information and Explanation</b> |   |
|---|---|
| Funding Year                              | 2014  |
| Application Number                        | Form 472 (BEAR) SLD Invoice Number 227990   |
| Funding Request Numbers and SPIN          | Based on Form 471 Number 989753<br>FRN 2701537 – Sprint   |
| Requested Outcome                         | Allow the funds to be properly reimbursed for a total of \$15,694.72 based on either 1) approving for reimbursement that amounts previously submitted by the school and certified by the vendor, or 2) by extending the invoice deadline to allow the school to resubmit its BEAR invoice for a third time and for the vendor to certify it.  |
| Appeal Reason and Explanation             | <p><b>Summary</b></p> <p><i>The School submitted a BEAR Form on time.</i><br/>The school submitted a timely BEAR form for reimbursement of internet services on October 23, 2015, which was certified by the vendor on the same day. <b><u>See Exhibit A.</u></b> The BEAR form included in line item 10 for Customer Billed date the actual date of the first invoice for the funding year, which was June 30, 2014 for service for July 2014, which was the beginning of the funding year. <b><u>See Exhibit B.</u></b></p> <p><i>It received a zero-funded BEAR Notification because of the billed date.</i><br/>The school then received a BEAR notification letter providing \$0.00 for reimbursement because of the invoice date being before the funding year began on July 1, 2014.</p> <p><i>The School sought advice and heeded it from both the state E-rate Coordinator and USAC within deadline.</i></p> |





As the BEAR notification letter was received after the deadline to submit BEAR forms for the funding year, and thus also past the deadline to submit a one-time invoice deadline extension request, the school sought the advice from two sources to resolve the issue. First, it met with the New York State E-Rate Coordinator, Wim Himsworth, at a training for EPC on November 23, 2015. At that training, he stated specifically that neither a letter nor a written appeal was necessary for a “zero funding BEAR notification.” Instead, calling USAC and alerting them to the issue will allow you to receive the clearance to resubmit the BEAR form. The school then did so on December 16, 2015. See Exhibit C. At that time, the representative, Michael, informed the school that instead of filing an appeal of the zero funded BEAR Notification, the approved approach would be to file for an invoice deadline extension request, which it did so the next day on December 17, 2015.

*USAC denied the School’s request despite it following received guidance.*

The school did so, even though it expressed concerns that under the new rules, such a request had to be done before October 28. See Exhibit D. Despite following the guidance of both the New York State E-rate Coordinator and USAC, the school’s request was denied. See Exhibit E.

*The School requests another invoice deadline extension or an opportunity to revise its certified BEAR Form to secure the reimbursement.*

In both the conversations with Mr. Himsworth and Mr. Leonard, the school did ask point blank whether submitting an appeal would have been the preferred approach to resolve the issue, since it received its BEAR Notification letter after the invoicing deadline and the invoice deadline request deadline of October 28. Following their advice, the school’s request was met with opposition from the Administrator, where the requested relief was not available because “Current deadline extension rules and procedures do not allow approval for the reason submitted.” See Exhibit E.

The school respectfully requests an opportunity to simply change the customer billed date one day from June 30, 2014 to July 1, 2014 so that the BEAR Form can be properly processed.

#### **Timeline:**

- October 23, 2015: Files original BEAR and receives vendor certification before invoicing deadline
- November 6, 2015: Receives BEAR notification letter approving \$0.00 for payment
- November 23, 2015: Spoke with NYS E-rate Coordinator in person, who recommended calling USAC to request an appeal to fix the BEAR form
- December 16, 2015: Call made to USAC requesting next steps, where they advised submitting an invoice deadline extension request
- December 17, 2015: Files first invoice deadline extension request to USAC
- January 18, 2016: Receives rejection notice of invoice deadline extension request



*For Ease of Reference and to conserve paper, the Exhibits Listed in this Appeal to the USAC Administrator were removed and now are Exhibits in this FCC Appeal.*

| <b><i>Exhibit #<br/>in this<br/>letter</i></b> | <b><i>Exhibit<br/># in the<br/>FCC<br/>Appeal</i></b> | <b><i>Date</i></b> | <b><i>Exhibit</i></b>                                 |
|--|---|--------------------|---|
| A  | A   | October 23, 2015   | Original Form 472                                     |
| B  | B   | June 30, 2014      | Invoice showing customer billed date of June 30, 2014 |
| N/A  | C   | November 6, 2015   | BEAR Notification Letter                              |
| C  | D   | December 16, 2015  | Record of call made to USAC                           |
| D  | E   | December 17, 2015  | Invoice Deadline Extension Request                    |
| E  | F   | January 18, 2016   | Rejection of invoice deadline Extension Request       |
| N/A  | G   | March, 17, 2016    | Appeal to USAC Administrator                          |
| N/A  | H   | April 29, 2016     | Denial of Appeal by USAC Administrator                |



# Exhibit H



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2014-2015**

April 29, 2016

Paul Le  
Paul Le  
342 East 119th St., Suite 3a  
New York, NY 10035-4279

Re: Applicant Name: THE RENAISSANCE CHARTER HIGH  
SCHOOL FOR INNOVATION  
Billed Entity Number: 16056470  
Form 471 Application Number: 989753  
Funding Request Number(s): 2701537  
Your Correspondence Dated: March 17, 2016

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Administrator's Decision on Invoice Deadline Extension Request Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2701537  
Decision on Appeal: **Denied**  
Explanation:

- FCC rules require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter, whichever is later. USAC denied your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with the FCC rules, your appeal is denied.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You



should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company